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10 *Attorney for Defendant, Bank of America, N.A.*

7 **THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 VERONICA PADILLA,

10 Plaintiff,

11 v.

12 BANK OF AMERICA, N.A. and TRANS
13 UNION LLC,

14 Defendants.
15

Case No. 2:23-cv-01760-GMN-DJA

**JOINT STIPULATION FOR EXTENSION
OF TIME FOR BANK OF AMERICA, N.A.
TO RESPOND TO PLAINTIFF'S
COMPLAINT [SECOND REQUEST]**

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17 **JOINT STIPULATION FOR EXTENSION OF TIME**

18 IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff
19 Veronica Padilla ("Plaintiff"), and counsel for Defendant Bank of America, N.A. ("Defendant or
20 Ditech"), that the time for Defendant to respond to Plaintiff's Complaint is extended up to and
21 including January 22, 2024.

22
23 On October 30, 2023, Plaintiff filed her Complaint [ECF No. 1]. Defendant was served with
24 Plaintiff's Complaint on November 1, 2023. The deadline for Defendant to respond to Plaintiff's
25 Complaint initially was November 22, 2023 and the current deadline is December 22, 2023. The
26 Parties have discussed extending the deadline for Defendant to respond to Plaintiff's Complaint to
27 allow for additional time to complete the investigation of the allegations and continue to discuss
28 possible resolution of the matter.

JOINT STIPULATION FOR EXTENSION OF TIME FOR BANK OF AMERICA, N.A.
TO RESPOND TO THE COMPLAINT

1 This is the second request for an extension of time for Defendant to file its responsive
2 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
3 any other party.

4 DATED: December 21, 2023

LAW OFFICE OF KEVIN L. HERNANDEZ

6
7 By: /s/ Kevin L. Hernandez

Kevin L. Hernandez, Esq.,

8 Attorney for Plaintiff
9 Veronica Padilla

10 DATED: December 21, 2023

WRIGHT FINLAY & ZAK, LLP

11
12 By: /s/Ramir M. Hernandez

13 Ramir M. Hernandez
14 Darren T. Brenner

15 Attorneys for Defendant
16 Bank of America, N.A.

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18 **IT IS SO ORDERED.**

19 DATED: 12/27/2023

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21 _____
22 DANIEL J. ALBREGTS
23 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT FINLAY & ZAK, LLP, and that on December 21, 2023, I caused to be served a true and correct copy of the foregoing ***JOINT STIPULATION FOR EXTENSION OF TIME FOR BANK OF AMERICA, N.A. TO RESPOND TO PLAINTIFF'S COMPLAINT***, in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List:

Kevin L. Hernandez
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/s/ Lisa Cox
An employee of WRIGHT FINLAY & ZAK, LLP